

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**MICHELLE BOURDELAIS,**  
*(formerly Michelle Durniak),*

**Plaintiff,**

**v.**

**CIVIL NO. 3:10-cv-00670-HEH**

**J.P. MORGAN CHASE BANK, NA,**

**and**

**CHASE HOME FINANCE, LLC,**

**Defendants.**

**PLAINTIFF'S SECOND SUPPLEMENTAL F.R.C.P. 26(a)(1) DISCLOSURES**

COMES NOW the Plaintiff, by counsel, and pursuant to Fed. R. Civ. P. 26(a)(1), and makes the following supplemental disclosures to Defendants.

**I. Individuals likely to have discoverable information**

54. Steve Newnom, Trans Union, 2 Baldwin Place, 1510 Chester Pike, Crum Lynne, PA 19022 - All facts regarding the Plaintiff's Trans Union Credit Reports, disputes, ACDV, Investigation Results and the documents produced pursuant to Subpoena in this matter.

55. Ace Christian Caraan – Chase ACDV Operator, - All facts regarding the ACDV received from Trans Union on or about June 8, 2010 and the response generated as a result of the investigation performed.

56. Teresa Iwanski, Experian 30(b)(6) Deposition witness deposed on January 3, 2013 - All facts regarding Plaintiff's Experian Credit reports, disputes, ACDV, Investigation Results and any and all documents produced pursuant to Subpoena in this

matter and any and all information regarding Ms. Iwanski's deposition testimony on January 3, 2013.

57. Bryan Alexander – Chase ACDV Operator - All facts regarding the ACDV received from Experian on or about June 9, 2010 and the response generated as a result of the investigation performed.

## **II. Description of documents in possession of the Plaintiff.**

Other than those documents obtained from the Defendant in discovery, the Plaintiff has the following additional documents in her possession and control:

Plaintiff's Bate Stamp Nos. 001847 – 002689 – *Plaintiff's counsel will forward Plaintiff's Supplemental Bate Stamped Exhibits under separate cover*

<b>Document Type</b>	<b>Bate Stamp #</b>
Experian Document Production per Subpoena – EXP-Bourdelaïs – 000001-000377	001847 – 002224
Prime Lending Documents	002225 - 002439
Documents received from Kroll Factual Data pursuant to Subpoena KFD000001 – KFD000081	002440 - 002522
Recorded Phone calls with Chase Employees and Transcription of these phone calls	002523 - 002580
Order of Absolute Divorce and Consent Order as to Property Distribution – St. Mary's County Maryland Circuit Court	002581 - 002587
October 10, 2012 Transcript of Hearing in St. Mary's County Maryland Circuit Court	002588 – 002645
Trust Agreement dated March 30, 2012	002646 - 002650
Appraisal dated September 12, 2011 of 5705 Lake West Terrace, Glen Allen, VA 23059	002651 - 002664
Letter dated January 5, 2013 from Carolyn Wallisch	002665
Records received pursuant to subpoena from Aquent with Authentication Affidavit of Kimberly Potter	002666 - 002689

Plaintiff reserves the right to further supplement these disclosures.

**MICHELLE BOURDELAIS,**

/s/

Leonard A. Bennett, Esq.

VSB #37523

Attorney for Plaintiff

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of January, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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/s/

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